

Andrew K. Glenn
Shai Schmidt
Rich Ramirez
GLENN AGRE BERGMAN & FUENTES LLP
55 Hudson Yards
20th Floor
New York, New York 10001
Telephone: (212) 358-5600

Counsel to the Ad Hoc Committee of Shareholders

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

)	Chapter 11
In re:)	
LATAM Airlines Group S.A., <i>et al.</i> , ¹)	Case No. 20-11254 (JLG)
Debtors.)	Jointly Administered
)	

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF NOTICES

PLEASE TAKE NOTICE that Glenn Agre Bergman & Fuentes LLP hereby appears in the above-captioned Chapter 11 Cases pursuant to Section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure

¹ The Debtors filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code (the “Chapter 11 Cases”), along with the last four digits of each Debtor’s U.S. or local tax identification number (as applicable), are: LATAM Airlines Group S.A. (59-2605885); Lan Cargo S.A. (98-0058786); Transporte Aéreo S.A. (96-9512807); Inversiones Lan S.A. (96-5758100); Technical Training LATAM S.A. (96-847880K); LATAM Travel Chile II S.A. (76-2628945); Lan Pax Group S.A. (96-9696800); Fast Air Almacenes de Carga S.A. (96-6315202); Línea Aérea Carguera de Colombia S.A. (26-4065780); Aerovías de Integración Regional S.A. (98-0640393); LATAM Finance Ltd. (N/A); LATAM Airlines Ecuador S.A. (98-0383677); Professional Airline Cargo Services, LLC (35-2639894); Cargo Handling Airport Services, LLC (30-1133972); Maintenance Service Experts, LLC (30-1130248); Lan Cargo Repair Station LLC (83-0460010); Prime Airport Services Inc. (59-1934486); Professional Airline Maintenance Services LLC (37-1910216); Connecta Corporation (20-5157324); Peuco Finance Ltd. (N/A); Latam Airlines Perú S.A. (52-2195500); Inversiones Aéreas S.A. (N/A); Holdco Colombia II SpA (76-9310053); Holdco Colombia I SpA (76-9336885); Holdco Ecuador S.A. (76-3884082); Lan Cargo Inversiones S.A. (96-9696908); Lan Cargo Overseas Ltd. (85-7752959); Mas Investment Ltd. (85-7753009); Professional Airlines Services Inc. (65-0623014); Piquero Leasing Limited (N/A); TAM S.A. (N/A); TAM Linhas Aéreas S.A. (65-0773334); Aerolinhas Brasileiras S.A. (98-0177579); Prismah Fidelidade Ltda. (N/A); Fidelidade Viagens e Turismo S.A. (27-2563952); TP Franchising Ltda. (N/A); Holdco I. S.A. (76-1530348) and Multiplus Corredora de Seguros Ltda. (N/A). For the purpose of these Chapter 11 Cases, the service address for the Debtors is: 6500 NW 22nd Street Miami, FL 33131.

(the “Bankruptcy Rules”), as counsel to funds managed by Milestone Vimba Fund L.P., Patrick Conlin, K-Bar Holdings, LLC, Kevin Barnes, and Adam Gui (as may be reconstituted from time to time, the “Ad Hoc Committee of Shareholders”), and requests, pursuant to Sections 342 and 1109(b) of the Bankruptcy Code and Bankruptcy Rules 2002, 9007, and 9010, that all notices given or required to be given in this case and all papers served or required to be served in this case be given to and served upon the undersigned at the following office address, telephone number and e-mail addresses:

Andrew K. Glenn
Shai Schmidt
Rich Ramirez
GLENN AGRE BERGMAN & FUENTES LLP
55 Hudson Yards
20th Floor
New York, New York 10001
Telephone: (212) 358-5600
E-mail: aglenn@glennagre.com
sschmidt@glennagre.com
rramirez@glennagre.com

PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, demand, memorandum, affidavit, declaration, presentment, order to show cause, disclosure statement and plan of reorganization, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically or otherwise, which affect the Debtors or property of the Debtors.

PLEASE TAKE FURTHER NOTICE that demand is also made that the above-referenced attorneys be added to the Notice List for notice of all contested matters, adversary proceedings, and other proceedings in these Chapter 11 Cases.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Documents shall not be deemed to be a waiver of the rights of the Ad Hoc Committee of Shareholders: (i) to have final orders in non-core matters entered only after *de novo* review by a District Court Judge; (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) to any other rights, claims, actions, setoffs, or recoupments to which the Ad Hoc Committee of Shareholders is or may be entitled, in law or in equity, all of which rights, claims, actions, setoffs, and recoupments the Ad Hoc Committee of Shareholders expressly reserves; or (v) to any and all defenses or objections the Ad Hoc Committee of Shareholders may have to any claims asserted against it in these cases including, without limitation, any defense based on insufficient service of process, jurisdiction (including personal jurisdiction), or capacity to be sued. The undersigned certifies that the parties listed in the first paragraph are admitted to practice before this Court.

Dated: May 19, 2021
New York, New York

By: /s/ Andrew K. Glenn
Andrew K. Glenn
Shai Schmidt
Rich Ramirez
**GLENN AGRE BERGMAN & FUENTES
LLP**
55 Hudson Yards
20th Floor
New York, New York 10001
Telephone: (212) 358-5600
E-mail: aglenn@glennagre.com
sschmidt@glennagre.com
rramirez@glennagre.com

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